

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

GREEN & HEALTHY HOMES INITIATIVE,
INC., ET AL.

Plaintiffs,

v.

ENVIRONMENTAL PROTECTION AGENCY,
ET AL.

Defendants.

Civil Action No. 1:25-cv-01096-ABA

[PROPOSED] PRELIMINARY INJUNCTION

Having reviewed Plaintiffs' Complaint and Motion for Preliminary Injunction, including all memoranda and evidence in support of the Motion, as well as any papers filed in opposition to the Motion, and in accordance with Federal Rules of Civil Procedure 65, the Court finds that Plaintiffs have satisfied the requirements for issuance of a preliminary injunction: (1) Plaintiffs have established a likelihood of success on the merits; (2) Plaintiffs will be irreparably harmed absent a preliminary injunction; (3) the balance of equities tip in Plaintiffs favor; and (4) an injunction is in the public interest.

It is therefore **ORDERED** that:

1. Defendants shall immediately reinstate Plaintiffs' Thriving Communities "initial grants" and restore Plaintiffs' access to the funds awarded in their Thriving Communities "subsequent grants," thereby returning the parties to the status quo prior to Defendants' termination and suspension of those grants;
2. Defendants are preliminarily enjoined from terminating, suspending, or freezing access to funds under any of the Plaintiffs' Thriving Communities grants;

3. Defendants shall file a status report with the Court within 24 hours of entry of this Preliminary Injunction confirming their compliance with its terms;
4. Defendants shall provide notice of this Preliminary Injunction within 24 hours of entry to all Defendants, their employees, and anyone acting in concert with them;
5. This Preliminary Injunction shall become effective immediately upon entry by this Court. It shall remain in effect until further order of this Court.

SO ORDERED

Dated: _____

Hon. Adam B. Abelson
United States District Court